Case 1:11-cr-00185-PAC Document 2 DOCUMENT PILED UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK - X : INDICTMENT UNITED STATES OF AMERICA : 11 Cr. - v. -11 CRIM 185 ABDURAMAN ISENI, a/k/a "Abdul Al Houssaine," a/k/a "Diamond," Defendant. JUDGE CROTTS

COUNT ONE

The Grand Jury charges:

- 1. From at least in or about October 2007 through in or about February 2008, in the Southern District of New York and elsewhere, ABDURAMAN ISENI, a/k/a "Abdul Al Houssaine," a/k/a "Diamond," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Sections 1956(a)(3)(A) and (B) of Title 18, United States Code.
- 2. It was a part and an object of the conspiracy that ABDURAMAN ISENI, a/k/a "Abdul Al Houssaine," a/k/a "Diamond," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct a financial transaction involving property represented to be the proceeds of specified unlawful activity, to wit, the proceeds of the distribution of controlled substances in violation of Title 21, United States Code, Section 841, with the

intent: (a) to promote the carrying on of specified unlawful activity; and (b) to conceal and disguise the nature, the location, the source, the ownership, and the control of the property believed to be the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(3)(A) and (B).

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION

offense in violation of 18 U.S.C. § 1956(h), as alleged in Count One of this Indictment, ABDURAMAN ISENI, a/k/a "Abdul Al Houssaine," a/k/a "Diamond," the defendant, shall forfeit to the United States pursuant to 18 U.S.C. § 982, all property, real and personal, involved in the money laundering offense and all property traceable to such property.

Substitute Asset Provision

- 4. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant --
 - (1) cannot be located upon the exercise of due diligence;
 - (2) has been transferred or sold to, or deposited with, a third person;
 - (3) has been placed beyond the jurisdiction of the Court;

- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)

PREET BHARARA

United States Attorney

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ABDURAMAN ISENI, a/k/a "Abdul Al Houssaine," a/k/a "Diamond,"

Defendant.

INDICTMENT

11 Cr.

(18 U.S.C. § 1956(h))

PREET BHARARA United States Attorney.

A TRUE BILL

Foreperson.